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UBER TECHNOLOGIES, INC.
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THE
DECLARATION OF ARTURO J.
GONZÁLEZ IN RESPONSE TO
DECLARATION OF JEFF
NARDINELLI AND EXHIBITS
THERE TO**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal the Declaration of Arturo J. González in Response to Declaration of Jeff Nardinelli and Exhibits Thereto. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Declaration of Arturo J. Gonzalez in Response to Declaration of Jeff Nardinelli (“Response Declaration”)	Highlighted Portions	Waymo Non-party Anthony Levandowski (yellow)
Exhibit 3	Entirety	Waymo
Exhibit 4	Highlighted Portions	Waymo
Exhibit 5	Entirety	Waymo
Exhibit 8	Highlighted Portions	Waymo (Green)

The yellow-highlighted portions of the Response Declaration contain information designated confidential by counsel for non-party Anthony Levandowski. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.) Defendants expect this non-party to file a supporting declaration as needed.

The green-highlighted portions of the Response Declaration and Exhibits 4 and 8, as well as the entireties of Exhibits 3 and 5, contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

1 Defendants served Waymo with this Administrative Motion to File Documents Under
2 Seal on September 18, 2017.

3 For the foregoing reasons, Defendants request that the Court enter the accompanying
4 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and
5 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
6 ATTORNEYS' EYES ONLY."

7 Dated: September 18, 2017

MORRISON & FOERSTER LLP

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9 By: /s/ Arturo J. González

ARTURO J. GONZÁLEZ

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11 UBER TECHNOLOGIES, INC. and
12 OTTOMOTTO LLC
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